

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JUAN QUINTANILLA VASQUEZ and  
GABRIELA PERDOMO ORTIZ, individually and  
on behalf of all others similarly situated,

**Plaintiffs.**

vs.

LIBRE BY NEXUS, INC. and JOHN DOES 1-50,

#### **Defendants.**

## **CONSUMERS LEGAL REMEDIES ACT VENUE DECLARATION**

I, Gabriela Perdomo Ortiz, declare as follows:

- 18        1. I am a named plaintiff in this litigation.

19        2. I have personal knowledge of the matters set forth below except to those matters stated

20 herein which are based on information and belief, which matters I believe to be true.

21        3. If called as a witness I could and would competently testify to the matters included herein.

22        4. I entered into a GPS tracking device lease agreement with Libre by Nexus on June 4, 2015.

23        5. I am informed and believe that venue is proper in this Court under California Civil Code §

24        1780(d) based on the fact that I reside in a county in this district.

25 I declare under penalty of perjury under the laws of the United States that the foregoing is  
26 true and correct and that this declaration was executed on February 14, 2017 in Oakland,  
27 California.

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By:

  
Gabriela Perdomo Ortiz